

THIS IS THE BEGINNING OF ADMINISTRATIVE FINE CASE # 3244

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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March 20, 2017

MEMORANDUM

SENSITIVE

TO: The Commission

THROUGH: Alec Palmer *PP*
Staff Director

FROM: Patricia C. Orrock *AC for PCO*
Chief Compliance Officer

Debbie Chacona *AC*
Assistant Staff Director
Reports Analysis Division

BY: Kristin D. Roser/Ben Holly *BH*
Reports Analysis Division *ll for KR*
Compliance Branch

SUBJECT: Reason To Believe Recommendation – 2016 12 Day Pre-General Report
(Unauthorized Committees – Quarterly Filers) for the Administrative Fine
Program

Attached is a list of political committees and their treasurers who failed to file or timely file the 2016 12 Day Pre-General Report in accordance with 52 U.S.C. § 30104(a). The list is comprised of unauthorized quarterly filers that made General Election contributions or expenditures from October 1, 2016 through October 19, 2016, and failed to file or timely file the 2016 12 Day Pre-General Report.

The committees listed on the attached RTB Circulation Report either failed to file the report or failed to file the report prior to four (4) days before the General Election (considered a non-filed report). In accordance with the schedule of civil money penalties at 11 CFR 111.43, these committees should be assessed the civil money penalties highlighted on the attached circulation report.

As noted above, the 2016 12 Day Pre-General Report circulation list includes unauthorized quarterly filers that made General Election contributions or expenditures from October 1, 2016 through October 19, 2016, but failed to file or timely file the 2016 12 Day Pre-General Election Report. In order to accurately identify these committees for administrative fine purposes, the Reports Analysis Division (RAD) used the following procedures and criteria:

- Every 12 Day Pre-General Report (12G) submitted by an unauthorized quarterly filer was reviewed to ensure that it disclosed General Election contributions or expenditures made during the coverage dates of the report. Any report meeting this definition that was filed late is included in the list. Any report not disclosing general election contributions or expenditures during this period is not included in the list, as it is not a required filing.
- Every 30 Day Post-General Report (30G) submitted by an unauthorized quarterly filer that covered the period from October 1, 2016 through November 28, 2016 (59 days) was reviewed for activity which would have required the filing of a 12G. If our research indicated that a 12G was required, we utilized a three-step method to arrive at the activity on which to base the 12G fine amount. First, we took the sum of all itemized receipts and disbursements that should have been disclosed on a 12G. Second, if the committee had any unitemized activity, a per diem level of this activity was calculated by multiplying the total amount of unitemized activity on the report by 32.2% (19 days (12G Filing Period)/59 days (30G Filing Period)). Third, we took the sum of the amounts calculated in steps one and two to arrive at the level of activity assigned to the 12G.

1. Find reason to believe that the political committees and their treasurers, in their official capacity, listed on the RTB Circulation Report violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalties would be the amounts indicated on the RTB Circulation Report.
2. Send the appropriate letters.

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Federal Election Commission
Reason to Believe Circulation Report
2016 PRE-GENERAL Election Sensitive 10/27/2016 UNAUTH_Q

AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
3235	C00623256	AMERICA COMES FIRST PAC		DAVID W. SCHAMENS	\$457,720	0	12/5/2016	Not Filed	\$10,711	\$1,176
3236	C00492579	AMERICAN PRINCIPLES		EYTAN LAOR	\$303,458	0	12/8/2016	Not Filed	\$2,796	\$654
3237	C00559146	BELIEVE IN LIFE LIBERTY YOURSELF (BILLY PAC)		JERED TAYLOR	\$197,500	0	1/26/2017	Not Filed	\$21,190	\$1,176
3238	C00078287	CNA FINANCIAL CORPORATION CITIZENS FOR GOOD GOVERNMENT		KAREN E. MELCHERT	\$428,835	0	11/28/2016	Not Filed	\$28,698	\$1,829
3239	C00109595	COMMUNICATION WORKERS OF AMERICA LOCAL 13000		MARISA MACCRORY	\$437,396	0	12/8/2016	Not Filed	\$15,242	\$1,176
3240	C00388181	CONNELL FOLEY PAC A NEW JERSEY NON-PROFIT CORPORATION		JOHN P. LACEY	\$120,691	0	1/31/2017	Not Filed	\$1,000	\$654
3241	C00387894	GCI PAC		CHRIS NIERMAN	\$114,199	0	12/20/2016	Not Filed	\$1,007	\$654
3242	C00297531	GOVERNMENT IS NOT GOD		NANCY MURRAY	\$118,518	0	12/16/2016	Not Filed	\$8,218	\$784
3243	C00332031	INDEPENDENT ELECTRICAL CONTRACTORS INC PAC (IEC PRIDE PAC)		JASON TODD	\$173,679	0	12/8/2016	Not Filed	\$5,202	\$784
3244	C00253369	INVESCO PLC PAC		DOUG KIDD	\$198,182	0	12/8/2016	Not Filed	\$5,000	\$784
3245	C00144170	LOUISIANIANS FOR AMERICAN SECURITY POLITICAL ACTION COMMITTEE		HANS STERNBERG	\$161,878	0	12/6/2016	Not Filed	\$4,000	\$654
3246	C00486860	MIDDLE CLASS AMERICA PAC		MIRIAM TAI	\$116,535	0	11/25/2016	Not Filed	\$12,000	\$1,176
3247	C00528026	NATIONAL CANNABIS INDUSTRY ASSOCIATION PAC		MICHAEL J. CORREIA	\$167,316	0	2/16/2017	Not Filed	\$1,000	\$654
3248	C00526046	PATRIOTS LEADING A MAJORITY		LOUIS SCHIAZZA	\$261,512	0	12/7/2016	Not Filed	\$49,000	\$1,829

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AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
3250	C00436410	ROCK CITY PAC		KIMBERLY KAEGI	\$1,265,601	0	11/28/2016	Not Filed	\$42,503	\$1,829
3251	C00586180	RUSS VICTORY FUND		JOHN W. MILLER	\$2,606,125	0	1/3/2017	Not Filed	\$540,606	\$15,282
3252	C00570226	SEAL PAC SUPPORTING ELECTING AMERICAN LEADERS PAC		VINCENT DEVITO	\$5,239,399	0	12/8/2016	Not Filed	\$314,463	\$12,503

BEFORE THE FEDERAL ELECTION COMMISSION .

In the Matter of)
)
Reason To Believe Recommendation - 2016)
12 Day Pre-General Report (Unauthorized)
Committees – Quarterly Filers) for the)
Administrative Fine Program:)
AMERICA COMES FIRST PAC, and) AF# 3235
SCHAMENS, DAVID W MR. as treasurer;)
AMERICAN PRINCIPLES, and LAOR,) AF# 3236
EYTAN as treasurer;)
BELIEVE IN LIFE LIBERTY YOURSELF) AF# 3237
(BILLY PAC), and TAYLOR, JERED as)
treasurer;)
CNA FINANCIAL CORPORATION) AF# 3238
CITIZENS FOR GOOD GOVERNMENT,)
and MELCHERT, KAREN E. as treasurer;)
COMMUNICATION WORKERS OF) AF# 3239
AMERICA LOCAL 13000, and)
MACCRORY, MARISA as treasurer;)
CONNELL FOLEY PAC A NEW JERSEY) AF# 3240
NON-PROFIT CORPORATION, and)
JOHN P LACEY as treasurer;)
GCI PAC, and NIERMAN, CHRIS as) AF# 3241
treasurer;)
GOVERNMENT IS NOT GOD, and) AF# 3242
MURRAY, NANCY as treasurer;)
INDEPENDENT ELECTRICAL) AF# 3243
CONTRACTORS INC PAC (IEC PRIDE)
PAC), and TODD, JASON as treasurer;)
INVESCO PLC PAC, and KIDD, DOUG as) AF# 3244
treasurer;)
LOUISIANIANS FOR AMERICAN) AF# 3245
SECURITY POLITICAL ACTION)
COMMITTEE, and STERNBERG, HANS)
as treasurer;)
MIDDLE CLASS AMERICA PAC, and) AF# 3246
MIRIAM TAI as treasurer;)

NATIONAL CANNABIS INDUSTRY AF# 3247
ASSOCIATION PAC, and MICHAEL J.
CORREIA as treasurer;
PATRIOTS LEADING A MAJORITY; and) AF# 3248
SCHIAZZA, LOUIS as treasurer;)

ROCK CITY PAC, and KAEGI,) AF# 3250
KIMBERLY as treasurer;)
RUSS VICTORY FUND, and MILLER,) AF# 3251
JOHN W. as treasurer;)
SEAL PAC SUPPORTING ELECTING) AF# 3252
AMERICAN LEADERS PAC, and)
DEVITO, VINCENT ESQ. as treasurer;)

CERTIFICATION

I, Dayna C. Brown, Secretary and Clerk of the Federal Election Commission,
do hereby certify that on March 22, 2017 the Commission took the following actions
on the Reason To Believe Recommendation - 2016-12 Day Pre-General Report
(Unauthorized Committees – Quarterly Filers) for the Administrative Fine Program as
recommended in the Reports Analysis Division's Memorandum dated March 20, 2017,
on the following committees:

AF#3235 Decided by a vote of 5-0 to: (1) find reason to believe that AMERICA
COMES FIRST PAC, and SCHAMENS, DAVID W MR. as treasurer violated 52 U.S.C.
30104(a) and make a preliminary determination that the civil money penalty would be the
amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman,
Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3236 Decided by a vote of 5-0 to: (1) find reason to believe that AMERICAN
PRINCIPLES, and LAOR, EYTAN as treasurer violated 52 U.S.C. 30104(a) and make a
preliminary determination that the civil money penalty would be the amount indicated on

the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3237 Decided by a vote of 5-0 to: (1) find reason to believe that BELIEVE IN LIFE LIBERTY YOURSELF (BILLY PAC), and TAYLOR, JERED as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3238 Decided by a vote of 5-0 to: (1) find reason to believe that CNA FINANCIAL CORPORATION CITIZENS FOR GOOD GOVERNMENT, and MELCHERT, KAREN E. as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3239 Decided by a vote of 5-0 to: (1) find reason to believe that COMMUNICATION WORKERS OF AMERICA LOCAL 13000, and MACCRORY, MARISA as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3240 Decided by a vote of 5-0 to: (1) find reason to believe that CONNELL FOLEY PAC A NEW JERSEY NON-PROFIT CORPORATION, and JOHN P LACEY as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3241 Decided by a vote of 5-0 to: (1) find reason to believe that GCI PAC, and NIERMAN, CHRIS as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3242 Decided by a vote of 5-0 to: (1) find reason to believe that GOVERNMENT IS NOT GOD, and MURRAY, NANCY as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3243 Decided by a vote of 5-0 to: (1) find reason to believe that INDEPENDENT ELECTRICAL CONTRACTORS INC PAC (IEC PRIDE PAC), and

TODD, JASON as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, ~~Hunter~~, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3244 Decided by a vote of 5-0 to: (1) find reason to believe that INVESCO PLC PAC, and KIDD, DOUG as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3245 Decided by a vote of 5-0 to: (1) find reason to believe that LOUISIANIANS FOR AMERICAN SECURITY POLITICAL ACTION COMMITTEE, and STERNBERG, HANS as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3246 Decided by a vote of 5-0 to: (1) find reason to believe that MIDDLE CLASS AMERICA PAC, and MIRIAM TAI as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3247 Decided by a vote of 5-0 to: (1) find reason to believe that NATIONAL CANNABIS INDUSTRY ASSOCIATION PAC, and MICHAEL J. CORREIA as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3248 Decided by a vote of 5-0 to: (1) find reason to believe that PATRIOTS LEADING A MAJORITY, and SCHIAZZA, LOUIS as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

17-00001-10017-8

AF#3250 Decided by a vote of 5-0 to: (1) find reason to believe that ROCK CITY PAC, and KAEGI, KIMBERLY as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3251 Decided by a vote of 5-0 to: (1) find reason to believe that RUSS VICTORY FUND, and MILLER, JOHN W. as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3252 Decided by a vote of 5-0 to: (1) find reason to believe that SEAL PAC SUPPORTING ELECTING AMERICAN LEADERS PAC, and DEVITO, VINCENT ESQ, as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

Attest:

March 22, 2017
Date

Dayna C. Brown
Dayna C. Brown
Secretary and Clerk of the Commission



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 24, 2017

Doug Kidd, in official capacity as Treasurer
Invesco PLC PAC
1360 Peachtree Street, NE
Atlanta, GA 30309

C00253369
AF#: 3244

Dear Mr. Kidd:

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that your committee file a 12 Day Pre-General Report of Receipts and Disbursements in a calendar year during which there is a regularly scheduled election. This report is required if your committee makes a contribution to or expenditure on behalf of a candidate in the general election. This report, covering the period October 1, 2016 through October 19, 2016, shall be filed no later than October 27, 2016. 52 U.S.C. § 30104(a). Because records at the Federal Election Commission ("FEC") indicate that you did not file this report prior to four (4) days before the General Election held on November 8, 2016, the report is considered not filed for the purpose of calculating the civil money penalty. You should file the report if you have not already done so.

The Act permits the FEC to impose civil money penalties for violations of the reporting requirements of 52 U.S.C. § 30104(a). 52 U.S.C. § 30109(a)(4). On March 22, 2017, the FEC found that there is reason to believe ("RTB") that Invesco PLC PAC and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) by failing to file timely this report on or before October 27, 2016. Based on the FEC's schedules of civil money penalties at 11 C.F.R. § 111.43, the amount of your civil money penalty calculated at the RTB stage is \$784. Please see the attached copy of the Commission's administrative fine regulations at 11 C.F.R. §§ 111.30-111.46. Attachment 1. The Commission's website contains further information about how the administrative fine program works and how the fines are calculated. See <http://www.fec.gov/af/af.shtml>. 11 C.F.R. § 111.34. Your payment of \$784 is due within forty (40) days of the finding, or by May 1, 2017, and is based on these factors:

Election Sensitivity of Report: Election Sensitive
Level of Activity: \$5,000
Number of Days Late: Not Filed (reports not filed prior to four (4) days before the General Election held on November 8, 2016 are considered not filed for the purpose of calculating the penalty)
Number of Previous Civil Money Penalties Assessed: 0

At this juncture, the following courses of action are available to you:

If you should decide to challenge the RTB finding and/or calculated civil money penalty, you must submit a written response to the FEC's Office of Administrative Review, 999 E Street, NW, Washington, DC 20463. Your response must include the AF# (found at the top of page 1 under your committee's identification number) and be received within forty (40) days of the Commission's RTB finding, or May 1, 2017. 11 CFR § 111.35(a). Your written response must include the reason(s) why you are challenging the RTB finding and/or calculated civil money penalty, and must include the factual basis supporting the reason(s) and supporting documentation. The FEC strongly encourages that documents be submitted in the form of affidavits or declarations. 11 CFR § 111.36(c).

The "failure to raise an argument in a timely fashion during the administrative process shall be deemed a waiver" of your right to present such argument in a petition to the U.S. District Court under 52 U.S.C. § 30109. 11 CFR § 111.38.

2. If You Choose Not to Pay the Civil Money Penalty and Not to Submit a Challenge

Unpaid civil money penalties assessed through the Administrative Fine regulations will be subject to the Debt Collection Act of 1982 ("DCA"), as amended by the Debt Collection

Improvement Act of 1996, 31 U.S.C. § 3701 *et seq.* The FEC may take any and all appropriate action authorized and required by the DCA, as amended, including transfer to the U.S. Department of the Treasury for collection. 11 CFR § 111.51(a)(2).

3. If You Choose to Pay the Civil Money Penalty

If you should decide to pay the calculated civil money penalty, follow the payment instructions on page 4 of this letter. Upon receipt of your payment, the FEC will send you a final determination letter.

NOTICE REGARDING PARTIAL PAYMENTS AND SETTLEMENT OFFERS

4. Partial Payments

If you make a payment in an amount less than the calculated civil money penalty, the amount of your partial payment will be credited towards the full civil money penalty that the Commission assesses upon making a final determination.

5. Settlement Offers

Any offer to settle or compromise a debt owed to the Commission, including a payment in an amount less than the calculated civil money penalty assessed or any restrictive endorsements contained on your check or money order or proposed in correspondence transmitted with your check or money order, will be rejected. Acceptance and deposit or cashing of such a restricted payment does not constitute acceptance of the settlement offer. Payments containing restrictive endorsements will be deposited and treated as a partial payment towards the civil money penalty that the Commission assesses upon making a final determination. All unpaid civil money penalty amounts remaining will be subject to the debt collection procedures set forth in Section 2, above.

This matter was generated based on information ascertained by the FEC in the normal course of carrying out its supervisory responsibilities. 52 U.S.C. § 30109(a)(2). Unless you notify the FEC in writing that you wish the matter to be made public, it will remain confidential in accordance with 52 U.S.C. § 30109(a)(4)(B) and 30109(a)(12)(A) until it is placed on the public record at the conclusion of this matter in accordance with 11 CFR § 111.42.

As noted earlier, you may obtain additional information on the FEC's administrative fine program, including the final regulations, on the FEC's website at <http://www.fec.gov/af/af.shtml>. If you have questions regarding the payment of the calculated civil money penalty, please contact Aimee Wechsler in the Reports Analysis Division at our toll free number (800) 424-9530 (at the prompt press 5) or (202) 694-1130. If you have questions regarding the submission of a challenge, please contact the Office of Administrative Review at our toll free number (800) 424-9530 (press 0, then ext. 1660) or (202) 694-1660.

On behalf of the Commission,



Steven T. Walther
Chair

ADMINISTRATIVE FINE REMITTANCE & PAYMENT INSTRUCTIONS

In accordance with the schedule of penalties at 11 CFR § 111.43, the amount of your civil money penalty calculated at RTB is \$784 for the 2016 Pre-General Report.

You may remit payment by ACH withdrawal from your bank account, or by debit or credit card through Pay.gov, the federal government's secure portal for online collections. Visit www.fec.gov/af/pay.shtml to be directed to Pay.gov's Administrative Fine Program Payment form.

This penalty may also be paid by check or money order, made payable to the Federal Election Commission. It should be sent by mail to:

Federal Election Commission
P.O. Box 979058
St. Louis, MO 63197-9000

If you choose to send your payment by courier or overnight delivery, please send to:

U.S. Bank - Government Lockbox
FEC #979058
1005 Convention Plaza
Attn: Government Lockbox, SL-MO-C2GL
St. Louis, MO 63101

PAYMENTS BY PERSONAL CHECK

Personal checks will be converted into electronic funds transfers (EFTS). Your account will be electronically debited for the amount on your check, usually within 24 hours, and the debit will appear on your regular statement. We will destroy your original check and keep a copy of it. In case the EFT cannot be processed for technical reasons, you authorize us to process the copy in lieu of the original check. Should the EFT not be completed because of insufficient funds, we may try to make the transfer twice.

PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT

FOR: Invesco PLC PAC

FEC ID#: C00253369

AF#: 3244

PAYMENT DUE DATE: May 1, 2017

PAYMENT AMOUNT DUE: \$784



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

2017 JUN 19 PM 1:04

June 19, 2017

MEMORANDUM

SENSITIVE

TO: The Commission

THROUGH: Alec Palmer *AP*
Staff Director

FROM: Patricia C. Orrock *PCO*
Chief Compliance Officer

Debbie Chacona *DC*
Assistant Staff Director
Reports Analysis Division

BY: Kristin D. Roser/Ben Holly *KR BH*
Reports Analysis Division
Compliance Branch

SUBJECT: Administrative Fine Program – Final Determination Recommendation for the
2016 12 Day Pre-General Report (Unauthorized Committees – Quarterly
Filers)

Attached are two lists of political committees and their treasurers against which the Commission has found reason to believe (RTB) and assessed proposed civil money penalties calculated at RTB for failure to file or failure to timely file the 2016 12 Day Pre-General Report. The first list represents the committees that have paid the civil money penalty and the second list represents the committees that have not paid the civil money penalty. The committees that have not paid have been given at least forty (40) days from the date of the Commission's RTB finding to remit payment.

In accordance with 11 CFR § 111.34 and 11 CFR § 111.40, the Commission shall send a final determination notice to those respondents that have either paid or not paid the civil money penalty.

For your information, two (2) committees disclosed a change in treasurer after the RTB finding. An overview of these cases has been provided below.

Middle Class America PAC (AF 3246) filed an Amended Statement of Organization after the RTB finding designating Jim Broeking as Treasurer.

SEAL PAC Supporting Electing American Leaders PAC (AF 3252) filed an Amended Statement of Organization after the RTB finding designating Barbara P. Lazaris as Treasurer.

RAD Recommendation

- (1) Make a final determination that the political committees and their treasurers, in their official capacity, listed on the attached reports violated 52 U.S.C. § 30104(a) and assess the final civil money penalties so indicated.
- (2) Send the appropriate letters.

UNCLASSIFIED

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Federal Election Commission
FD Circulation Report Fine Not Paid
2016 PRE-GENERAL Election Sensitive 10/27/2016 UNAUTH_Q

AF#	Committee Name	Candidate Name	Committee ID	Treasurer	Receipt Date	Days Late	LOA	PV	RTB Date	RTB Penalty	Days Since RTB	FD Penalty
3235	AMERICA COMES FIRST PAC		C00823256	DAVID W. SCHAMENS	12/05/2016	Not Filed	\$10,711	0	03/22/2017	\$1,176	89	\$1,176
3248	PATRIOTS LEADING A MAJORITY		C00526046	LOUIS SCHIAZZA	12/07/2016	Not Filed	\$49,000	0	03/22/2017	\$1,829	89	\$1,829
3252	SEAL PAC SUPPORTING ELECTING AMERICAN LEADERS PAC		C00570226	BARBARA P. LAZARIS	12/08/2016	Not Filed	\$387,182	0	03/22/2017	\$12,503	89	\$12,503

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	
Administrative Fine Program – Final)	
Determination Recommendation for the)	
2016 12 Day Pre-General Report)	
(Unauthorized Committees - Quarterly)	
Filers):)	
AMERICA COMES FIRST PAC, and)	AF# 3235
SCHAMENS, DAVID W MR. as treasurer;)	
AMERICAN PRINCIPLES, and LAOR,)	AF# 3236
EYTAN as treasurer;)	
BELIEVE IN LIFE LIBERTY YOURSELF)	AF# 3237
(BILLY PAC), and TAYLOR, JERED as)	
treasurer;)	
CNA FINANCIAL CORPORATION)	AF# 3238
CITIZENS FOR GOOD GOVERNMENT,)	
and MELCHERT, KAREN E. as treasurer;)	
COMMUNICATION WORKERS OF)	AF# 3239
AMERICA LOCAL 13000, and)	
MACCRORY, MARISA as treasurer;)	
CONNELL FOLEY PAC A NEW JERSEY)	AF# 3240
NON-PROFIT CORPORATION, and)	
JOHN P LACEY as treasurer;)	
GCI PAC, and NIERMAN, CHRIS as)	AF# 3241
treasurer;)	
GOVERNMENT IS NOT GOD, and)	AF# 3242
MURRAY, NANCY as treasurer;)	
INDEPENDENT ELECTRICAL)	AF# 3243
CONTRACTORS INC PAC (IEC PRIDE)	
PAC), and TODD, JASON as treasurer;)	
INVESCO PLC PAC, and KIDD, DOUG as)	AF# 3244
treasurer;)	
LOUISIANIANS FOR AMERICAN)	AF# 3245
SECURITY POLITICAL ACTION)	
COMMITTEE, and STERNBERG, HANS)	
as treasurer;)	
MIDDLE CLASS AMERICA PAC, and)	AF# 3246
BROEKING, JIM as treasurer;)	
NATIONAL CANNABIS INDUSTRY)	AF# 3247
ASSOCIATION PAC, and MICHAEL J.)	
CORREIA as treasurer;)	
PATRIOTS LEADING A MAJORITY, and)	AF# 3248
SCHIAZZA, LOUIS as treasurer;)	

ROCK CITY PAC, and KAEGI,)	AF# 3250
KIMBERLY as treasurer;)	
RUSS VICTORY FUND, and MILLER,)	AF# 3251
JOHN W. as treasurer;)	
SEAL PAC SUPPORTING ELECTING)	AF# 3252
AMERICAN LEADERS PAC, and)	
LAZARIS, BARBARA P. as treasurer;)	

CERTIFICATION

I, Dayna C. Brown, Secretary and Clerk of the Federal Election Commission, do hereby certify that on June 21, 2017 the Commission took the following actions on the Administrative Fine Program – Final Determination Recommendation for the 2016 12 Day Pre-General Report (Unauthorized Committees - Quarterly Filers) as recommended in the Reports Analysis Division's Memorandum dated June 19, 2017, on the following committees:

AF#3235 Decided by a vote of 5-0 to: (1) make a final determination that AMERICA COMES FIRST PAC, and SCHAMENS, DAVID W MR. in his official capacity as treasurer, violated 52 U.S.C. 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3236 Decided by a vote of 5-0 to: (1) make a final determination that AMERICAN PRINCIPLES, and LAOR, EYTAN in his official capacity as treasurer, violated 52 U.S.C. 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3237 Decided by a vote of 5-0 to: (1) make a final determination that BELIEVE IN LIFE LIBERTY YOURSELF (BILLY PAC), and TAYLOR, JERED in his official capacity as treasurer, violated 52 U.S.C. 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3238 Decided by a vote of 5-0 to: (1) make a final determination that CNA FINANCIAL CORPORATION CITIZENS FOR GOOD GOVERNMENT, and MELCHERT, KAREN E. in her official capacity as treasurer, violated 52 U.S.C. 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3239 Decided by a vote of 5-0 to: (1) make a final determination that COMMUNICATION WORKERS OF AMERICA LOCAL 13000, and MACCRORY, MARISA in her official capacity as treasurer, violated 52 U.S.C. 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3240 Decided by a vote of 5-0 to: (1) make a final determination that CONNELL FOLEY PAC A NEW JERSEY NON-PROFIT CORPORATION, and JOHN P LACEY in his official capacity as treasurer, violated 52 U.S.C. 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3241 Decided by a vote of 5-0 to: (1) make a final determination that GCI PAC, and NIERMAN, CHRIS in his official capacity as treasurer, violated 52 U.S.C. 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3242 Decided by a vote of 5-0 to: (1) make a final determination that GOVERNMENT IS NOT GOD, and MURRAY, NANCY in her official capacity as treasurer, violated 52 U.S.C. 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3243 Decided by a vote of 5-0 to: (1) make a final determination that INDEPENDENT ELECTRICAL CONTRACTORS INC PAC (IEC PRIDE PAC), and TODD, JASON in his official capacity as treasurer, violated 52 U.S.C. 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3244 Decided by a vote of 5-0 to: (1) make a final determination that INVESCO PLC PAC, and KIDD, DOUG in his official capacity as treasurer, violated 52 U.S.C. 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3245 Decided by a vote of 5-0 to: (1) make a final determination that LOUISIANIANS FOR AMERICAN SECURITY POLITICAL ACTION COMMITTEE, and STERNBERG, HANS in his official capacity as treasurer, violated 52 U.S.C. 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3246 Decided by a vote of 5-0 to: (1) make a final determination that MIDDLE CLASS AMERICA PAC, and BROEKING, JIM in his official capacity as treasurer, violated 52 U.S.C. 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3247 Decided by a vote of 5-0 to: (1) make a final determination that NATIONAL CANNABIS INDUSTRY ASSOCIATION PAC, and MICHAEL J. CORREIA in his official capacity as treasurer, violated 52 U.S.C. 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3248 Decided by a vote of 5-0 to: (1) make a final determination that PATRIOTS LEADING A MAJORITY, and SCHIAZZA, LOUIS in his official capacity as treasurer, violated 52 U.S.C. 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3250 Decided by a vote of 5-0 to: (1) make a final determination that ROCK CITY PAC, and KAEGI, KIMBERLY in her official capacity as treasurer, violated 52 U.S.C. 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3251 Decided by a vote of 5-0 to: (1) make a final determination that RUSS VICTORY FUND, and MILLER, JOHN W. in his official capacity as treasurer, violated 52 U.S.C. 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3252 Decided by a vote of 5-0 to: (1) make a final determination that SEAL PAC SUPPORTING ELECTING AMERICAN LEADERS PAC, and LAZARIS, BARBARA P. in her official capacity as treasurer, violated 52 U.S.C. 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

Federal Election Commission
Certification for Administrative Fines
June 21, 2017

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Attest:

June 22, 2017
Date

Dayna C. Brown

Dayna C. Brown
Secretary and Clerk of the Commission

17-00000-110000



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 22, 2017

Doug Kidd, in official capacity as Treasurer
Invesco PLC PAC
1360 Peachtree Street, NE
Atlanta, GA 30309

C00253369
AF#: 3244

Dear Mr. Kidd:

On March 22, 2017, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that Invesco PLC PAC and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) for filing late or failing to file the 2016 Pre-General Report. By letter dated March 24, 2017, the Commission notified you of the RTB finding and the civil money penalty calculated at the RTB stage totaling \$784 in accordance with the schedule of penalties at 11 CFR § 111.43.

On April 25, 2017, the FEC received payment of the civil money penalty calculated at the RTB stage. The FEC made a final determination on June 22, 2017 that Invesco PLC PAC and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a), assessed a civil money penalty in the amount of \$784 in accordance with 11 CFR § 111.43, and voted to close the file.

The confidentiality provisions at 52 U.S.C. § 30109(a)(12) no longer apply and this matter is now public. Pursuant to 11 CFR §§ 111.42(b) and 111.20(c), the file will be placed on the public record within thirty (30) days from the date of this notification.

If you have any questions regarding this matter, please contact Aimee Wechsler on our toll free number (800) 424-9530 (at the prompt press 5) or (202) 694-1130.

On behalf of the Commission,

A handwritten signature in black ink, appearing to read "Steven T. Walther".

Steven T. Walther
Chair

View Plastic Card Details

Card #1

Transaction Type: Sale
Account Holder Name: Douglas B Kidd
Billing Address: 185 Peachtree Street NE
Billing Address 2:
City: Atlanta
State/Province: GA
ZIP/Postal Code: 30309
Country: USA
Plastic Card Type: AmericanExpress
Plastic Card Number: [REDACTED]
Approved Amount: \$784.00
Total Number of Installments: 1
Transaction Date: 04/25/2017
AF#: 3244
Committee Name: Invesco PLC PAC
FEC ID: [REDACTED]
Agency Memo: [REDACTED]

THIS IS THE END OF ADMINISTRATIVE FINE CASE # 3244

17-00000-1